

## Biomethane Workshop questions for Panel A

The following questions are related to biomethane produced outside the state and delivered to California for use at an in-state electric generating facility.

1. The fourth edition of the RPS guidebook requires biomethane to be delivered to California or the electricity generation facility if it is located outside of California before it can be used in the generation facility. Given the two separate pipeline systems in California is it appropriate to require:
  - a. Delivery of biomethane to the gas pipeline system in California from which the facility accepts delivery of gas, or directly to the electricity generation facility if it is located outside of California, or
  - b. Delivery of biomethane directly to the electricity generating facility.
2. Should the Energy Commission consider adding any location requirements to sources allowed to provide biomethane to facilities participating in California's RPS in addition to any restrictions implied by required delivery agreements?
3. The Energy Commission currently allows backhaul and forward haul transportation agreements that are either firm or interruptible to be considered eligible delivery methods, should the Energy Commission:
  - a. Retain the current requirements?
  - b. Restrict delivery to only forward haul transportation?
  - c. Restrict delivery to only firm transportation agreements?

Please provide reasoning for your response.

4. Should any delay be allowed in the consumption of biomethane at the electric generating facility once it has been delivered to California or the electricity generating facility? If so, please specify what reasons for delays should be allowed and what, if any, limits should be imposed on the delay. Explain your answer. If no delay should be allowed, please explain why.
5. How should the Energy Commission treat biomethane imbalances resulting from differences between scheduling and use of the biomethane?
  - a. Specify why such imbalances could occur, and if they should be allowed. Please explain.
  - b. What limits are placed on imbalances by pipelines, and should the Energy Commission enforce stricter limits on imbalances? Please explain.
  - c. What is the magnitude of imbalances in natural gas deliveries, and how do imbalances in biomethane deliveries differ?

6. What records should an applicant for an electric generating facility using pipeline biomethane be required to maintain and provide to the Energy Commission in the event of an audit process. How will these records ensure that the biomethane has not been claimed for use by more than one entity and all delivery and eligibility requirements have been met?